

DRAFT

Mr. Sam Wohlford
Plant Manager
Hutchinson Sealing Systems, Inc.
1150 South Third Street
Wytheville, Virginia 24382

Location: Wytheville, Virginia
Registration No. 11019
County-Plant ID No. 51-197-00066

Dear Mr. Wohlford:

Attached is a permit to operate your rubber mixing, extruding and molding manufacturing facility in accordance with the Virginia Regulations for the Control and Abatement of Air Pollution. This permit supersedes your permit dated July 3, 2007.

This permit contains legally enforceable conditions. Failure to comply may result in a Notice of Violation and civil charges. Please read all permit conditions carefully.

The Department of Environmental Quality (DEQ) deemed the application complete on October 11, 2007, and solicited written comments by placing a newspaper advertisement in the *Wytheville Enterprise* on ___, 2007. The required comment period provided by 9 VAC 5-80-1020 A expired on ___, 2007, with ___ comments having been received.

This permit approval shall not relieve Hutchinson Sealing Systems, Inc. of the responsibility to comply with all other local, state, and federal permit regulations.

The Board's Regulations as contained in Title 9 of the Virginia Administrative Code 5-170-200 provide that you may request a formal hearing from this case decision by filing a petition with the Board within 30 days after this case decision notice was mailed or delivered to you. 9 VAC 5-170-200 provides that you may request direct consideration of the decision by the

Mr. Sam Wohlford

DRAFT

Page 2

Board if the Director of the DEQ made the decision. Please consult the relevant regulations for additional requirements for such requests.

As provided by Rule 2A:2 of the Supreme Court of Virginia, you have 30 days from the date you actually received this permit or the date on which it was mailed to you, whichever occurred first, within which to initiate an appeal of this decision by filing a Notice of Appeal with:

David K. Paylor, Director
Department of Environmental Quality
P. O. Box 1105
Richmond, VA 23218

If this permit was delivered to you by mail, three days are added to the thirty-day period in which to file an appeal. Please refer to Part Two A of the Rules of the Supreme Court of Virginia for information on the required content of the Notice of Appeal and for additional requirements governing appeals from decisions of administrative agencies.

If you have any questions concerning this permit, please call the regional office at (276) 676-4800.

Sincerely,

Dallas R. Sizemore
Deputy Regional Director

DRS/RAL/SOP-11019-07

Attachment: Permit

- b. Director, OAPP (electronic file submission)
Manager, Data Analysis (electronic file submission)

STATIONARY SOURCE PERMIT TO OPERATE

This permit supersedes your permit dated July 3, 2007.

In compliance with the Federal Clean Air Act and the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution,

Hutchinson Sealing Systems, Inc.
1150 South Third Street
Wytheville, Virginia 24382
Registration No. 11019
County-Plant ID No. 51-197-00066

is authorized to operate

rubber mixing, extruding, and molding manufacturing operations

located at

1150 South Third Street and 455 Industry Road
in Wytheville, Virginia

in accordance with the Conditions of this permit.

Approved on DRAFT.

Dallas R. Sizemore
Deputy Regional Director

Permit consists of 12 pages.
Permit Conditions 1 to 22.

INTRODUCTION

This permit approval is based on the permit application dated July 11, 2007, October 10, 2006, and amendment information dated December 6, 2006, January 13 and February 16, 2007, August 21, 2007, September 6, 2007, and October 4, 2007, and the permit application dated March 8, 2006, the permit application letters dated April 27, 2007, February 6, 2007, March 1, 2004, February 25, 2000, January 29, 1999, and December 2, 1997, including amendment information received on December 23, 1997, January 5, 1998, January 23, 1998, February 20, 1998, October 20, 1998, June 8, 2004, September 1, 2004, June 12, 2006, and June 13, 2007. Any changes in the permit application specifications or any existing facilities which alter the impact of the facility on air quality may require a permit. Failure to obtain such a permit prior to construction may result in enforcement action.

Words or terms used in this permit shall have meanings as provided in 9 VAC 5-10-20 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution. The regulatory reference or authority for each condition is listed in parentheses () after each condition.

Annual requirements to fulfill legal obligations to maintain current stationary source emissions data will necessitate a prompt response by the permittee to requests by the DEQ or the Board for information to include, as appropriate: process and production data; changes in control equipment; and operating schedules. Such requests for information from the DEQ will either be in writing or by personal contact.

The availability of information submitted to the DEQ or the Board will be governed by applicable provisions of the Freedom of Information Act, §§ 2.2-3700 through 2.2-3714 of the Code of Virginia, § 10.1-1314 (addressing information provided to the Board) of the Code of Virginia, and 9 VAC 5-170-60 of the State Air Pollution Control Board Regulations. Information provided to federal officials is subject to appropriate federal law and regulations governing confidentiality of such information.

PROCESS REQUIREMENTS

1. **Equipment List** – Equipment at this facility consists of the following:

Equipment to be Operated	
Equipment Description	Rated Capacity
Extrusion Line #1 consisting of:	0.66 ton/hr
Two rubber extruders	-----
Adhesive applicator	-----
Flocker	-----
Electric curing oven	-----
Water cooling system	-----
Pullers/Post formers	-----

Laser printer	-----
Equipment to be Operated	
Equipment Description	Rated Capacity
Cutoff saw	-----
Extrusion Line #2 consisting of:	0.66 ton/hr
Two rubber extruders	
One Cim-Dor natural gas-fired shock oven	0.31 MMBtu/hr
Microwave oven	-----
Three Cim-Dor natural gas-fired curing ovens (#1 - #3)	0.31 MMBtu/hr, each
Primer spray booth	-----
Coating/Adhesive booth	-----
Electric Esch heating unit	-----
Flocker	-----
Water cooling system	-----
Puller/Post formers	-----
Laser printer	-----
Cutoff saw	-----
Extrusion Line #3 consisting of:	0.83 ton/hr
Two rubber extruders	-----
Adhesive applicator	-----
Flocker	-----
Electric curing oven	-----
Water cooling system	-----
Pullers/Post formers	-----
Laser printer	-----
Cutoff saw	-----
Extrusion Line #4 consisting of:	0.83 ton/hr
Two rubber extruders	
One Esch natural gas-fired shock oven	0.31 MMBtu/hr
One Esch microwave oven with natural gas assist	0.41 MMBtu/hr
One Esch natural gas-fired curing oven #1	0.48 MMBtu/hr
Primer spray booth	-----
Adhesive applicator	-----
Coating booth	-----
Flocker	-----
Two Esch natural gas-fired curing ovens #2 & #3	0.96 MMBtu/hr, each
Water cooling system	-----

Pullers/Post formers	-----
Equipment to be Operated	
Equipment Description	Rated Capacity
Laser printer	-----
Marking machine	-----
Cutoff saw	-----
Rubber-on-Glass Line #1 (molding operations) consisting of:	0.05 ton/hr
Two primer application robots	-----
Fourteen curing presses (ROG units)	-----
Two automatic flock machines	-----
Rubber Mixing Line #1 consisting of:	5 tons/hr
Two process oil storage tanks	8,000 gallons, each
One process oil storage tank	10,000 gallons
Rubber mixer	-----
Drop mill	-----
Strip mill	-----
Pelletizer/Blenders	-----
Water cooling system	-----
Batch-off machine	-----
Rubber Mixing Line #2 consisting of:	5 tons/hr
Drop Mill	-
Rubber mixer	-----
Twin screw extruders	-----
Cooling unit	-----
Process oil storage tank	16,000 gallons
Water cooling system	-----

Equipment Exempt from Permitting			
Equipment Description	Rated Capacity	Exemption Citation	Exemption Date
One polyethylene reticulate extruder on Extrusion Line #1	48 lb/hr	9 VAC 5-80-1320 D	12/11/06
One PlasmaTreat unit on Extrusion Line #2	16 cfm	9 VAC 5-80-1320 D	12/11/06
One polyethylene reticulate extruder on Extrusion Line #2	48 lb/hr	9 VAC 5-80-1320 D	2/23/07
One PlasmaTreat unit on Extrusion Line #4	16 cfm	9 VAC 5-80-1320 D	2/23/07
One polyethylene reticulate extruder on Extrusion Line #4	48 lb/hr	9 VAC 5-80-1320 D	2/23/07
Registered Equipment			
Equipment Description	Rated Capacity		
One natural gas-fired Grieve curing oven	0.4 MMBtu/hr		
Fifty-six mold presses on Rubber-on-Glass Line #1	-----		

Specifications included in the permit under this Condition are for informational purposes only and do not form enforceable terms or conditions of the permit.
 (9 VAC 80-1180 D 3 and 9 VAC 5-80-850)

2. **Emission Controls** – Particulate emissions from the end of the curing ovens shall be controlled by electrostatic precipitators. The electrostatic precipitators shall be provided with adequate access for inspection.
 (9 VAC 5-80-1180, 9 VAC 5-50-260, and 9 VAC 5-80-850)
3. **Emission Controls** – Excess flock from the electrostatic flockers shall be controlled by enclosure and a flock recirculating system. The electrostatic flockers shall be provided with adequate access for inspection.
 (9 VAC 5-80-1180, 9 VAC 5-50-260, and 9 VAC 5-80-850)
4. **Emission Controls** – Particulate emissions from the spray booths shall be controlled by paint filters. The spray booths shall be provided with adequate access for inspection.
 (9 VAC 5-80-1180, 9 VAC 5-50-260, and 9 VAC 5-80-850)

5. **Emission Controls** – Particulate emissions from the rubber mixing lines shall be controlled by two dust collectors. The dust collectors shall be provided with adequate access for inspection.
(9 VAC 5-80-1180, 9 VAC 5-50-260, and 9 VAC 5-80-850)
6. **Testing/Monitoring Ports** – The permitted facility shall be constructed so to allow for emissions testing and monitoring upon reasonable notice at any time, using appropriate methods. Sampling ports shall be provided when requested at the appropriate locations and safe sampling platforms and access shall be provided.
(9 VAC 5-50-30 F, 9 VAC 5-80-1180, and 9 VAC 5-80-850)

OPERATING LIMITATIONS/EMISSION LIMITS

7. **Production** – Total combined production of EPDM and natural rubber from the rubber mixing lines shall not exceed 45,000 tons per year, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months. A change in the type of materials used in the EPDM and natural rubber production may require a permit to modify and operate.
(9 VAC 5-80-1180 and 9 VAC 5-80-850)
8. **Throughput** – Total combined throughput of EPDM rubber to Extrusion Lines 1 through 4 and the Rubber-on-Glass Line (molding operations) shall not exceed 8,000 tons per year, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months. A change in the type of materials used in the extruding and molding equipment may require a permit to modify and operate.
(9 VAC 5-80-1180 and 9 VAC 5-80-850)
9. **Emission Limits** - Hazardous air pollutant (HAP) throughput and emissions, as defined by §112(b) of the Clean Air Act, from the facility shall not exceed 9.9 tons per year of any individual HAP or 24.9 tons per year of any combination of HAPs, calculated monthly as the sum of each consecutive 12-month period. HAPs which are not accompanied by a specific CAS number shall be calculated as the sum of all compounds containing the named chemical when determining compliance with the individual HAP emissions limitation of 9.9 tons per year.
(9 VAC 5-80-850)

10. Facility Criteria Pollutant Emission Limits- Emissions of specified criteria pollutants shall not exceed the following:

- a. The emissions of volatile organic compounds from the rubber mixing processes, the Extrusion Lines 1 through 4, and the Rubber-on-Glass line (molding operations) shall not exceed 75 tons per year, calculated monthly as the sum of each consecutive 12 month period.
- b. The emission of particulate matter from the entire facility shall not exceed 9.9 tons per year of PM/PM10, calculated monthly as the sum of each consecutive 12 month period.

The permittee's compliance with the annual volatile organic compound emission limitation and the annual PM and PM10 emission limitations contained in this condition shall in no way construe or imply compliance with any limitations stated elsewhere within this permit.
(9 VAC 5-80-850 and 9 VAC 5-80-1180)

- 11. Visible Emission Limit** – Visible emissions from curing oven, electrostatic precipitator, primer spray booth and top coat spray booth exhausts shall not exceed five (5) percent opacity, each, as determined by the EPA Method 9 (reference 40 CFR 60, Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.
(9 VAC 5-80-850, 9 VAC 5-50-260 and 9 VAC 5-80-1180)

RECORDS

- 12. On Site Records** – The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Director, Southwest Regional Office. These records shall include, but are not limited to:

- a. Material Safety Data Sheets (MSDS) or other vendor information showing VOC content, hazardous air pollutant content, water content, and solids content for each material (coating, adhesive, ink, thinner, cleaning solution, etc.) used. A change in the type of material used may require a permit to modify and operate.
- b. Hourly (averaged monthly based on actual material usage and actual hours of usage), monthly and annual material consumption (in gallons or pounds) of each material (coating, adhesive, ink, thinner, cleaning solution, etc.) used. Annual throughput shall be calculated as the sum of each consecutive 12 month period. Hourly throughputs shall be calculated by dividing monthly throughput of material (coating, adhesive, ink, thinner, fountain solution, cleaning solution, other) by hours of operation in that month.

- c. Combined annual throughput of EPDM rubber to Extrusion Lines 1 through 4 and the Rubber-on-Glass Line (molding operations), calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
- d. Annual production of EPDM and natural rubber and throughput for the rubber mixing lines, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
- e. Monthly and annual VOC emissions calculations to demonstrate compliance with limits set forth in Condition 10(a). Annual emissions shall be calculated monthly as the sum of each consecutive 12 month period. Annual PM/PM10 emission calculations to demonstrate compliance with limits set forth in Condition 10(b) shall be performed as follows:

PM/PM10 emissions (tons/year) =
 $\text{Gal/yr} \times \text{lb/gal (material density)} \times \% \text{solids} \times (1 - \text{transfer efficiency}^*) \times (1 - \text{control efficiency}) \times 1 \text{ T/2000 lbs.}$

*50% transfer efficiency used for calculations

- f. The permittee shall record the name of the material, specific gravity, and VOC content for each material used, as documented by the manufacturers' MSDS and/or product specification sheets. Electronic emission estimating records, such as spreadsheets, which are used to calculate monthly VOC emissions shall be updated by the 15th day of the month following any material or formulation changes or for inspection. The permittee shall conduct an annual review to verify that such changes are accounted for in the emissions calculations.
- g. Scheduled and unscheduled maintenance, and operator training.
- h. Logs of daily hours of operation for the individual units of the rubber mixing, extruding, and molding manufacturing operations.

These records shall be available on-site for inspection by the DEQ and shall be current for the most recent five (5) years. The records shall be made available by the 15th day of each month, at which time totals shall include the previous month's data.
(9 VAC 5-80-1180, 9 VAC 5-50-50, and 9 VAC 5-80-850)

GENERAL CONDITIONS

13. Permit Suspension/Revocation – This permit may be suspended or revoked if the permittee:

- a. Knowingly makes material misstatements in the permit application or any amendments to it;
- b. Fails to comply with the conditions of this permit;
- c. Fails to comply with any emission standards applicable to a permitted emissions unit;
- d. Causes emissions from the stationary source which result in violations of, or interfere with the attainment and maintenance of any ambient air quality standard; or
- e. Fails to operate in conformance with any applicable control strategy, including any emission standards or emission limitations, in the State Implementation Plan in effect at the time an application for this permit is submitted.
(9 VAC 5-80-1210 F and 9 VAC 5-80-850)

14. Right of Entry – The permittee shall allow authorized local, state, and federal representatives, upon the presentation of credentials:

- a. To enter upon the permittee's premises on which the facility is located or in which any records are required to be kept under the terms and conditions of this permit;
- b. To have access to and copy at reasonable times any records required to be kept under the terms and conditions of this permit or the State Air Pollution Control Board Regulations;
- c. To inspect at reasonable times any facility, equipment, or process subject to the terms and conditions of this permit or the State Air Pollution Control Board Regulations; and
- d. To sample or test at reasonable times.

For purposes of this condition, the time for inspection shall be deemed reasonable during regular business hours or whenever the facility is in operation. Nothing contained herein shall make an inspection time unreasonable during an emergency.
(9 VAC 5-170-130, 9 VAC 5-80-1180, and 9 VAC 5-80-850)

15. Maintenance/Operating Procedures – The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to air pollution control equipment and process equipment which affect such emissions:

- a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.
- b. Maintain an inventory of spare parts.
- c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.
- d. Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures, prior to their first operation of such equipment. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

Records of maintenance and training shall be maintained on site for a period of five years and shall be made available to DEQ personnel upon request.

(9 VAC 5-50-20 E, 9 VAC 5-80-1180 D, and 9 VAC 5-80-850)

16. Record of Malfunctions – The permittee shall maintain records of the occurrence and duration of any bypass, malfunction, shutdown or failure of the facility or its associated air pollution control equipment that results in excess emissions for more than one hour. Records shall include the date, time, duration, description (emission unit, pollutant affected, cause), corrective action, preventive measures taken and name of person generating the record.

(9VAC 5-20-180 J, 9 VAC 5-80-1180 D, and 9 VAC 5-80-850)

17. Notification for Facility or Control Equipment Malfunction – The permittee shall furnish notification to the Director, Southwest Regional Office of malfunctions of the affected facility or related air pollution control equipment that may cause excess emissions for more than one hour, by facsimile transmission, telephone or telegraph. Such notification shall be made as soon as practicable but no later than four daytime business hours after the malfunction is discovered. The permittee shall provide a written statement giving all pertinent facts, including the estimated duration of the breakdown, within two weeks of discovery of the malfunction. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the permittee shall notify the Director, Southwest Regional Office.

(9 VAC 5-20-180 C, 9 VAC 5-80-1180, and 9 VAC 5-80-850)

18. **Violation of Ambient Air Quality Standard** – The permittee shall, upon request of the DEQ, reduce the level of operation or shut down a facility, as necessary to avoid violating any primary ambient air quality standard and shall not return to normal operation until such time as the ambient air quality standard will not be violated.
(9 VAC 5-20-180 I, 9 VAC 5-80-1180, and 9 VAC 5-80-850)
19. **Change of Ownership** – In the case of a transfer of ownership of a stationary source, the new owner shall abide by any current permit issued to the previous owner. The new owner shall notify the Director, Southwest Regional Office of the change of ownership within 30 days of the transfer.
(9 VAC 5-80-1240 and 9 VAC 5-80-850)
20. **Permit Copy** – The permittee shall keep a copy of this permit on the premises of the facility to which it applies.
(9 VAC 5-70-160 and 9 VAC 5-80-850)

STATE-ONLY ENFORCEABLE CONDITIONS

The following terms and conditions are included in this permit to implement the requirements of 9 VAC 5-40-130 et seq., 9 VAC 5-50-130 et seq., 9 VAC 5-60-200 et seq. and/or 9 VAC 5-60-300 et seq. and are enforceable only by the Virginia Air Pollution Control Board. Neither their inclusion in this permit nor any resulting public comment period make these terms federally enforceable.

21. **Limited Use of Toxic Pollutants** - The permittee is limited to use of the following toxic compounds in all of the facility processes:

<u>Toxic Compounds</u>	<u>CAS Number</u>
Toluene	108883
Xylene	1330207
Ethylbenzene	100414
Methyl Isobutyl Ketone	108101
Ethylene Glycol	107211
Methylene diphenyl diisocyanate (MDI)	101688
Chlorobenzene	108907
Diethylene Glycol Monobutyl Ether	112345
Methylene Chloride	75092
Carbon Tetrachloride	56235
Chloroform	67663
Triethylamine	121448
Methanol	67561
Formaldehyde	50000

The permittee may use additional toxic compounds in the facility processes under 9 VAC 5-60-300 C without obtaining a new permit provided the following conditions are met:

- a. Notification shall be given to the Director, Southwest Regional Office. Such notification shall be made within fifteen (15) days after the use of additional toxic compounds and shall include identification of the toxic compound, the date the toxic compound was first used, and the anticipated maximum throughput of that compound in lbs/hr and tons/yr. Additional details of the notification should be arranged with the Director, Southwest Regional Office.
- b. The potential to emit of the additional toxic pollutant from the entire plant shall be less than the exempt emission rate for that pollutant, calculated using the definition of "potential to emit" in 9 VAC 5-60-310, the procedures and formula of 9 VAC 5-60-300 C.1 and Threshold Limit Values (TLVs) approved by the Department.
- c. The permittee shall not use any additional toxic compound that would make the facility subject to federal emission standards in 40 CFR 61 or 40 CFR 63.
- d. In no event shall facility-wide emissions of any volatile and/or particulate toxic compound exceed the maximum annual volatile organic compound or particulate limitations in Condition 10. Annual emissions are calculated as the sum of emissions from the facility during any period of 12 consecutive months. Hourly emissions are calculated by dividing total monthly emissions by hours of operation in that month. Any demonstration of compliance with the Significant Ambient Air Concentration Guidelines of 9 VAC 5-50-190 shall not relieve the requirement to comply with this condition.

If a permit is required, failure to obtain the permit prior to the change in process formulation or the use of any additional toxic compound may result in enforcement action.
(9 VAC 5-80-850, 9 VAC 5-80-1120 F, 9 VAC 5-170-160 and 9 VAC 5-60-300)

22. On Site Records - The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this section of the permit. The content and format of such records shall be arranged with the Director, Southwest Regional Office. These records shall include, but are not limited to:

- a. Hourly, monthly and annual material balance calculations to determine the emissions of each toxic pollutant for demonstration of compliance with the plantwide individual and total toxic compound emission limitations set forth in Conditions 9 and 21. The data shall include the amount of toxic component in the coating material or thinner according to the most up-to-date MSDS for each material. Hourly throughput shall be calculated monthly by dividing the monthly usage of each toxic compound by the hours of operation in that month. Annual throughput and emissions shall be calculated monthly as the sum of each consecutive 12 month period.

- b. Material Safety Data Sheets (MSDS) or other vendor information showing toxic air pollutant content for each material (coating, adhesive, thinner, cleaning solution, etc.) used. A change in the type of material used may require a permit to modify and operate.
- c. The permittee shall record the toxic air pollutant content for each material used, as documented by the manufacturers' MSDS and/or product specification sheets. Electronic emission estimating records, such as spreadsheets, which are used to calculate monthly regulated toxic air pollutant emissions shall be updated by the 15th day of the month following any material or formulation changes or for inspection. The permittee shall conduct an annual review to verify that such changes are accounted for in the emissions calculations.
- d. Hourly, monthly, and annual throughput of each toxic compound. Annual throughput is calculated monthly as the sum of each consecutive 12 month period.
- e. Hourly, monthly and annual throughput (in gallons or pounds) of each material used in the facility processes. Annual throughputs shall be calculated monthly as the sum of each consecutive 12 month period.

These records shall be available on-site for inspection by the DEQ and shall be current for the most recent five (5) years. The records shall be made available by the 15th day of each month, at which time totals shall include the previous month's data.
(9 VAC 5-80-1120 F and 9 VAC 5-60-50)